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February 13, 2004

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Marlene H. Dortch, Esquire
Secretary
Federal Communications Commission
445 12th Street, S.W., Room TW-B204
Washington, D.C. 20554

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Re: Petition for Rule Making
FM Table of Allotments, Section 73.202(b)
Arago, Minnesota

Dear Ms. Salas:

Transmitted herewith, on behalf of R.P. Broadcasting, Inc., are an original and four copies of its Petition for Rule Making, which seeks amendment of Section 73.202(b) of the Commission's Rules, the FM Table of Allotments, to add Channel 231C3 at Arago, Minnesota, as that community's first local radio transmission service.

Should any questions arise concerning this matter, please communicate with this office.

Very truly yours,



Anne Goodwin Crump
Counsel for R.P. Broadcasting, Inc.

Enclosures

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MB 04-17

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Counsel for R.P. Broadcasting, Inc.

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OFFICE OF THE SECRETARY

In the Matter of)
)
Amendment of Section 73.202(b),) MM DOCKET NO. _____
Table of Allotments, FM Broadcast Stations.) RM- _____
(Arago, Minnesota))

PETITION FOR RULE MAKING

R.P. Broadcasting, Inc. ("R.P."), by counsel, hereby respectfully requests that Section 73.202(b) of the Commission's Rules, the Table of Allotments for FM Broadcast Stations, be amended to add Channel 231C3 at Arago, Minnesota, as that community's first local transmission service. With respect thereto, the following is submitted:

1. R.P. is seeking the allotment of Channel 231C3 at Arago, Minnesota, to provide that community with its first local broadcast transmission service. As set forth in the attached Engineering Statement, the proposed allotment can be made in compliance with the Commission's Rules and policies. *See* Exhibit 1. Specifically, the proposed allotment of Channel 231C1 meets all separation requirements and also complies with the Commission's city coverage requirements.

2. Further, Arago is a community in need of local radio service. Arago township is listed in the 2000 United States Census as having a population of 586. Arago is located in Hubbard County, Minnesota. It has a town board which meets the first Monday of each month and several

other times a month as needed. In addition, Arago has a township hall building, where the meetings take place. Thus, it is clear that the town is both recognized by the U.S. Census and has its own local government.

3. In addition, Arago is home to a number of businesses. These include both retail stores and a number of resorts. In addition, it is anticipated that a new planned community will be developed on Island Lake in the township. *See, Lakeside Estates Plat Forwarded to County Board, http://www.parkrapidsenterprise.com/article.cfm?Article_ID=491*, as reviewed on January 21, 2004. Thus, Arago is a growing and developing community. A first local radio service is thus needed to serve the needs of the area and to cover issues associated with its growth and development.

4. As indicated above, Channel 231C3 can be allotted to Arago in accordance with the Commission's rules and policies. Such an allotment clearly would serve the public interest by providing an outlet for coverage of the needs and interests of the community. R.P. desires to provide such a first local radio service to Arago. In the event that Channel 231C3 is allotted to Arago, R.P. will apply for a construction permit for those facilities upon the opening of a filing window, and, upon grant, will expeditiously construct such facilities in accordance with its permit.

WHEREFORE, the premises considered, R.P. respectfully requests that the FM Table of Allotments be amended to add Channel 231C3 at Arago, Minnesota.

Respectfully submitted,

R.P. BROADCASTING, INC.

By:

A handwritten signature in cursive script, appearing to read "Anne Goodwin Crump".

Harry F. Cole

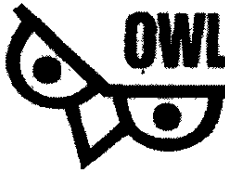
Anne Goodwin Crump

Its Counsel

FLETCHER, HEALD & HILDRETH, P.L.C.
1300 North 17th Street
Eleventh Floor
Arlington, Virginia 22209
(703) 812-0400

February 13, 2004

EXHIBIT 1



OWL ENGINEERING & EMC TEST LABS, INC.

CONSULTING COMMUNICATIONS ENGINEERS • EMC TEST LABORATORIES

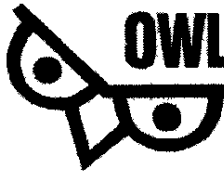
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651-784-7445 • Fax 651-784-7541

800-797-1338

MICHIGAN OFFICE
27451 Everett Street, Southfield, MI 48076
248-557-7274 • Fax 248-557-7275

**ENGINEERING STATEMENT ON BEHALF OF
RP BROADCASTING
IN SUPPORT OF A PETITION TO AMEND
THE FM TABLE OF ALLOTMENTS
CHANNEL 231 C3 ARAGO, MINNESOTA**

JANUARY 2, 2004



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Owl Engineering, Inc. has been retained by RP Broadcasting to prepare this engineering statement in support of a Petition to Amend the FM Table of allotments, FCC Rule Section 73.202(b) as follows:

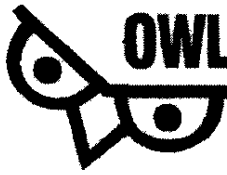
<u>Location</u>	<u>Present</u>	<u>Proposed</u>
Arago, MN	None	231C3

The reference coordinates for the transmitter location used in this study are:

<p>NAD 27 47° 08' 05" North Latitude 95° 12' 27" West Longitude</p>

These coordinates are based on the reference coordinates for the transmitter location needed to provide coverage to the community of Arago, Minnesota. The community of Arago has a population of 485 persons based on US Census data. The reference site is 9.9 kilometers at an azimuth of 340° from the center city coordinates of Arago, Minnesota.

An engineering study was performed to determine compliance with FCC Rule Section 73.207 regarding the Commission's minimum mileage spacing requirements. Included as Engineering Exhibit E-1 is a channel allocation study based on the reference coordinates listed above. As can be seen from this exhibit, RP Broadcasting's proposal is in complete conformance with FCC Rule Section 73.207. There is an area to locate a transmitter site that will satisfy these minimum mileage spacing requirements and FAA obstruction concerns.



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Further analysis was performed to determine compliance with FCC Rule Section 73.315 regarding City Grade (70-dBu) service to the community of Arago. The effective antenna height for each of the eight standard 45-degree spaced radials, along with the radial through the principal community was used in conjunction with the F(50,50) metric curves of Figure 1 of Section 73.333 of the Rules was used to determine the distances to the 70 dBu coverage contour, as required by the Rules. This analysis shows that all of Arago will receive a signal in excess of 70 dBu meeting the coverage requirements of the Rules. Figure 1 shows the predicted 70-dbu-signal coverage contour.

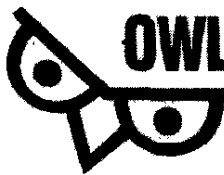
An engineering study was performed to determine the number of persons predicted to be served by a Class C3 facility located at the reference coordinates. The 60-dBu contour was calculated for a maximized Class C3 facility and it was determined that a total of 17,732 persons are encompassed within the predicted 4,316 square kilometer signal coverage area.

Based on the engineering studies provided, the following conclusions can be obtained:

1. The proposal will provide Arago, Minnesota with a First local full time broadcast service.
2. The proposal meets the requirements of FCC Rule Section 73.315.
3. The proposal meets the requirements of FCC Rule Section 73.207.
4. Based on 2000 US Census data 17,732 persons will be served by a signal of 60 dBu or greater with a transmitter located at the reference coordinates.

Respectfully Submitted,

Garrett G. Lysiak, P.E.



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ENGINEERING EXHIBIT E-1

CHANNEL ALLOCATION STUDY

***** FM CHANNEL SPACING STUDY *****

Job title: ARAGO ALLOCATION STUDY
Proposed latitude: N 47 8 5.00
Proposed longitude: W 95 12 27.00
Database file name: C:\FCCdata\2004\
Use pre-1989 Class A spacings?: N

Proposed channel: 231C3

CH	Call	Record	City	ST	Status	Bear.	Dist.	Reqd. Dist.	Result
232C3	KKIN-FM	9220	AITKIN	MN	LIC	111.5	132.2	99.0	
230C1	WTBX	9223	HIBBING	MN	LIC	80.1	168.2	144.0	24.2
230C1	WTBX	9227	HIBBING	MN	APP	80.1	168.2	144.0	24.2
231A	KKLN	9559	ATWATER	MN	LIC	171.2	231.8	142.0	
234C2	KSKK	9570	STAPLES	MN	LIC	146.6	77.4	56.0	21.4
231A	KFML	9571	LITTLE FALLS	MN	LIC	151.5	142.6	142.0	0.6
232C3	KULO	9901	ALEXANDRIA	MN	LIC	188.6	134.3	99.0	
229C	WDAY-FM	10798	FARGO	ND	LIC	265.6	151.9	96.0	
234C1	KNOX-FM	10813	GRAND FORKS	ND	LIC	305.4	170.4	76.0	

***** End of channel 231 study *****

